

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

FANSTEEL METALS, INC.,
f/k/a FMRI, INC.

Plaintiff,

vs.

Case No.: CIV-22-366-KEW

(1) CITIGROUP, INC.; and,
(2) UNION CARBIDE CORPORATION

Defendants.

DISCLOSURE STATEMENT

"PARTY" DEFINED: Within this form, the terms "party" and "parties" refer to any party, intervenor, or proposed intervenor to this action.

Pursuant to Fed. R. Civ. P. 7.1:

UNION CARBIDE CORPORATION

[enter name of party on the line above]

who is a (check one) ☐ PLAINTIFF ☒ DEFENDANT ☐ OTHER: _____

in this action, makes the following disclosures:

INSTRUCTIONS:

1. Determine which part(s) of the form apply:
 - Part I is applicable only in diversity cases and must be completed by all parties.
 - Part II is applicable in all cases and must be completed by all nongovernmental parties that are not natural persons.
2. Check the applicable box or boxes, and fully provide any required information.
3. Attach separate pages as necessary to fully provide required information.

PART I

- ☐ This party is an individual who resides in _____.
- ☐ This party is a corporation incorporated in New York and with a principal place of business in New York.
- ☐ This party is an unincorporated association or another artificial entity, including a limited liability company or limited liability partnership.

If yes, identify the nature of the entity, the members of the entity and the member's state of citizenship. If any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well.

- ☐ This party is a trust.

If yes, identify each trustee and each trustee's state of citizenship. If any trustee is other than an individual person, the required information identifying ownership of the non-individual trustee and state of citizenship of each sub-trustee must be provided as well.

PART II

☐ This party is publicly held.

☒ This party has one or more parent entities.

If yes, identify all parent entities, including grandparent and great-grandparent entities.

Dow Inc.
The Dow Chemical Company

☒ This party has one or more subsidiaries.

If yes, identify all subsidiaries.

ACM Services, Inc.
Calidria Corporation
Carbide Chemical (Thailand) Limited
Dow International Holdings Company
Dow Quimica Mexicana S.A. de C.V.
Dow Technology Investments LLC
Penuelas Technology Park LLC
Seadrift Pipeline Corporation
South Charleston Sewage Treatment Company
Texas City/La Marque Community Air Monitoring Network Corporation
UCAR Louisiana Pipeline Company
UCAR Pipeline Incorporated
Umetco Minerals Corporation
Union Carbide Asia Pacific, Inc.
Union Carbide Philippines (Far East), Inc.
Union Carbide South Africa (Proprietary) Limited
Westbridge Insurance Ltd.

☒ Ten percent or more of the stock of this party is owned by a publicly held corporation or other publicly held entity.

If yes, identify all such owners.

Union Carbide Corporation is a wholly owned subsidiary of the Dow Chemical Company. The Dow Chemical Company is a wholly owned subsidiary of Dow Inc., which is a publicly held corporation.

☐ Another association, firm, partnership, corporation, or other artificial entity related to the party—not already identified through other answers—has a direct financial interest in the outcome of the litigation.

If yes, identify all associations, firms, partnerships, corporations or other artificial entities and the nature of their interest.

☐ This party is a trade association.

If yes, identify all members of the association, their parent entities, and any publicly held companies that own ten percent or more of a member's stock.

☐ This party is a trust.

If yes, identify each trustee, their parent entities, and any publicly held companies that own ten percent or more of a trustee's stock.

Any additional pertinent information should also be provided on attached page(s).

DATED this 7th day of March, 2023.

Signature: s/Michael J. Linneman

Printed Name: Michael J. Linneman

Bar Number: IL 6275375

Firm Name: Johnson & Bell, Ltd.

Address: 33 W. Monroe St., Suite 2700

City, State, Zip Code: Chicago, IL 60603

Phone/Fax: 312.372.0770 / 312.372-9818

Email Address: linnemanm@jbltd.com

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2023 (Date), I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

Gary D. Justis
Michael S. Linscott
Linda C. Martin
Ethan Sneed

I hereby certify that on _____ (Date), I served the same document by

☐ U.S. Postal Service

☐ In Person Delivery

☐ Courier Service

☐ E-Mail

on the following, who are not registered participants of the ECF system:

Name(s) and Address(es): N/A

s/Michael J. Linneman
Signature